

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff	§	
	§	
v.	§	No. 4:20-CV-00960
	§	
\$902,746.64 in UNITED STATES	§	
CURRENCY, ET AL	§	
Defendant	§	

**VERIFIED COMPLAINT FOR FORFEITURE IN REM**

In accordance with Fed. R. Civ. P. Supplemental Rule G(2), the United States of America, Plaintiff, brings this complaint and alleges as follows:

**Nature of the Action**

1. This is an action to forfeit property to the United States for a violation of 21 U.S.C. § 846 (Conspiracy to Distribute Methamphetamine, Heroin, Marijuana, and Cocaine), and 18 U.S.C. § 1956 (Conspiracy to Commit Money Laundering).

**Defendant In Rem**

2. The Defendant Property is:
- \$902,746.64 seized from Wells Fargo Bank Account #2525,
  - \$234,775.25 seized from Zameer Lokhandwalla on June 18, 2020,

c. \$34,424.46 seized from Whitney and Hancock Bank Account #0205 on June 19, 2020,

d. \$27,181.88 seized from Wells Fargo Bank Account #9841 on June 19, 2020,

e. \$899.00 seized from Zameer Lokhandwalla on June 18, 2020,

f. 2016 Mercedes Benz GL450, VIN: 4JGDF6EEXGA667374, seized from Zameer Lokhandwalla on June 18, 2020,

g. 2016 Land Rover, VIN: SALGS2EF9GA247404, seized from Zameer Lokhandwalla on June 18, 2020,

h. 2015 BMW i8 Coupe VIN: \*\*\*\*2966 seized by the DEA on June 22, 2020 in Plano, TX.

i. Gold Coins and Gold bars seized from Zameer Lokhandwalla on June 18, 2020:

1. Ten 1 oz Canadian Maple Leaf Gold \$50 coins,
2. Two 1 oz Canadian Maple Leaf Gold \$50 coins,
3. One 1 oz 2011 U.S. American Eagle Gold \$50 coin,
4. One 1913 U.S. Indian Quarter Eagle Gold Coin,
5. Four 1927 Great Britain Sovereign Gold Coins,
6. Three Great Britain Sovereign Gold Coins,
7. One Middle East Gold Round,

8. One 1/10<sup>th</sup> oz 2006 U.S. American Eagle Gold Coin,
9. Five 37.5 grams CM Assayers .999 Find Gold Bullion Bars,
10. Two 5 Gram PAMP .999 Find Gold Bullion Bars,
11. One 10 Grams Pert Mint .999 Fine Gold Bullion Bar,
12. One 1 oz PAMP Fine Gold Bullion Bar,
13. One 100 Grams Valcambi Suisse .999 Fine Gold Bullion Bar,
14. Four 1 oz .999 Fine Gold Bullion Bars.

j. Assorted Jewelry seized from Zameer Lokhandwalla on June 18, 2020:

1. One Diamond Engagement Ring by Dayanii in 18K White Gold,
2. One Diamond Engagement Ring by “KC” in 14K White Gold,
3. One Pave Diamond Cat Pendant in 14K White Gold,
4. One Diamond Semi-Mount by “Royalty” in 18K White Gold,
5. One Princess Diamond Engagement Ring in 14K Yellow Gold,
6. One Ruby and Diamond Fashion Ring in 18K Yellow Gold,
7. One Diamond Free-Form Ring in 18K Two Tone Gold,
8. One Diamond Fashion Ring in 14K White Gold,
9. One Pearl and Diamond Fashion Ring in 18K Yellow Gold,
10. One Saddle Style Diamond Fashion Ring in White Gold,
11. One Diamond Fashion Ring by “Royalty” in 18K Two Tone

Gold,

12. One Double Trillion Diamond Engagement Ring in 14K Yellow Gold,

13. One Rolex GMT Master II Serial No. KX606885,

k. Assorted Jewelry seized from Zameer Lokhandwalla on June 18, 2020:

1. One Pave Diamond Cat Pendant in 14K White Gold – 30.5 Grams,

2. One Mens Audemars Piquet Royal Oak Offshore Watch,

l. Assorted Jewelry seized from Reshma Damanwalla on June 18, 2020:

1. One Ruby and Diamond Ring in 18K White Gold,  
2. One Ring Style Diamond Pendant by “Royalty” in 14K Two Tone Gold,

3. One Cartier Diamond Bracelet in 18K Yellow Gold,

4. One Diamond Solitaire Earring 14K White Gold,

5. One Diamond Bracelet in 14K White Gold, and

6. One Rolex Perpetual Datejust

(hereinafter, collectively, “Defendant Property”).

#### Jurisdiction and Venue

3. The Court has subject matter jurisdiction over an action commenced by the United States pursuant to 28 U.S.C. § 1345, and over an action for forfeiture pursuant to 28 U.S.C. § 1355(a).

4. The Court has *in rem* jurisdiction over the Defendant Property pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1)(A) because acts or omissions giving rise to the forfeiture occurred in this district.

#### Basis for Forfeiture

6. The Defendant Property is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6), because it is moneys, negotiable instruments, securities, or other things of value furnished or intended to be furnished by any person in exchange for a controlled substance or listed chemical in violation of 21 U.S.C. § 846, or proceeds traceable to such an exchange; and pursuant to 18 U.S.C. § 981 because it is any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956, 1957, or 1960, or any property traceable to such property.

#### Facts

7. The facts and circumstances supporting the forfeiture of the above-described property are briefed below and contained in the Affidavit of Special Agent Marcus West, which is attached hereto and incorporated herein by reference.

a. In July 2019, law enforcement initiated a Federal Narcotics and Money Laundering investigation targeting a Drug Trafficking Organization (hereinafter, “DTO”)

based in Durango, Mexico, Plano, Frisco, Carrollton, Lewisville, Rockwall, Fort Worth, Arlington and Dallas, Texas.

b. In August 2019, law enforcement identified Zameer Lokhandwalla (hereafter, “Lokhandwalla”) as money launder for the DTO based in the Dallas and Plano, Texas areas, an area within the Eastern District of Texas.

c. Law enforcement identified Lokhandwalla as a DTO money launder who worked closely with the DTO, where Lokhandwalla received deliveries of multi-thousands in drug proceeds and that Lokhandwalla . In 2019, CS1 delivered a plastic bag containing drug proceeds to Lokhandwalla purchased numerous properties and vehicles for other DTO members to avoid law enforcement detection.

d. On June 18, 2020, as part of a search and arrest operation targeting Lokhandwalla and his DTO members, law enforcement seized approximately \$1.8 million in drug proceeds, a combined 42 kilograms of heroin and cocaine, 100,000 Xanax pills, jewelry, 22 firearms, and 21 vehicles.

e. On that same date, law enforcement executed search warrant at 1707 Torrey Pines Lane, Frisco, Texas, the residence of Lokhandwalla, which resulted in the discovery and seizing of \$234,775.25 U.S. Currency, a large amount of jewelry and two (2) vehicles. Analysis of seized documents showed Lokhandwalla owned two bank accounts, x2515 and x9841, at Wells Fargo and one bank account at Hancock and

Whitney x0205. Through a subsequent warrant Agents discovered and seized over \$900,000 in U.S. currency amongst the three accounts.

Potential Claimants

8. The known potential claimants to the Defendant Property are:
  - a. Zameer Lokhandwalla, 1707 Torrey Pines Lane, Frisco, Texas 75034,
  - b. Reshma Damanwala, 1707 Torrey Pines Lane, Frisco, Texas 75034,
  - c. Tom Pappas, Burleson Pate & Gibson, LLP, 900 Jackson Street, Suite 330, Dallas, Texas 75202.

Claim for Relief

9. The United States respectfully requests that the Court forfeit the Defendant Property to the United States, award costs and disbursements in this action to the United States, and order any other relief that the Court deems appropriate.

Respectfully submitted,

STEPHEN J. COX  
UNITED STATES ATTORNEY

/s/ Kevin McClendon  
Kevin McClendon  
Assistant United States Attorney  
State Bar No. 13408620  
101 East Park Blvd., Suite 500  
Plano, Texas 75074

(972) 509-1201  
(972) 509-1209 (fax)

**CERTIFICATION OF FILING OF MOTION TO SEAL**

Pursuant to Local Rule CV-5(a)(7)(A), undersigned counsel certifies that on December 17, 2020, Plaintiff filed a Motion to Seal Affidavit Supporting the Complaint for Forfeiture In Rem. [Doc. #2]

/s/ Kevin McClendon  
KEVIN MCCLENDON  
Assistant United States Attorney



**VERIFICATION PURSUANT TO 28 U.S.C. § 1746**

I, Marcus West, hereby state that:

1. I am a Special Agent with the Drug Enforcement Administration.
2. I have read this Complaint, and the information contained herein is true and correct to the best of my knowledge.
3. The information contained in this Complaint comes from the official files and records of the United States, statements from other law enforcement officers, and my investigation of this case.

I state and verify under penalty of perjury that the foregoing is true and correct.



Marcus West  
Special Agent  
Drug Enforcement Administration

Dated: 12/17/2020

**Affidavit Supporting the  
Complaint for Forfeiture In Rem  
Filed Under Seal**

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	No. 4:20-cv-00960
	§	
\$902,746.64 IN UNITED STATES	§	
CURRENCY, et al	§	
Defendant.	§	

**ORDER FOR WARRANT OF ARREST IN REM**

TO: The Clerk of the Court, United States District Court for the Eastern District of Texas

WHEREAS, on December 17, 2020, the United States of America filed a verified complaint for civil forfeiture in the United States District Court for the Eastern District of Texas against the defendant property, alleging that the property is subject to seizure and civil forfeiture to the United States for the reasons alleged in the complaint; and

WHEREAS, the Court, having reviewed the Complaint and the Government's Application for Warrant of Arrest in Rem, finds, the defendant property is currently in the possession, custody, or control of the United States; and

WHEREAS, Supplemental Rule G(3)(b)(i) provides that the clerk must issue a warrant to arrest the property if it is in the government's possession, custody, or control;

YOU ARE, THEREFORE, HEREBY COMMANDED to issue an arrest warrant in rem for the defendant property pursuant to Supplemental Rule G(3)(b)(i); and

YOU ARE FURTHER COMMANDED to deliver the arrest warrant in rem to a

person or organization authorized to execute it who may be a marshal or any other United States officer or employee, someone under contract with the United States, or someone specially appointed by the Court for that purpose, pursuant to Supplemental Rule G(3)(c)(i).

IT IS SO ORDERED,

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
Plaintiff,	§	
	§	
v.	§	No. 4:20-cv-00960
	§	
\$902,746.64 IN UNITED STATES	§	
CURRENCY, et al	§	
Defendant.	§	

**WARRANT OF ARREST IN REM**

TO: The United States Marshals Service for the Eastern District of Texas and/or any other United States officer or employee, someone under contract with the United States, or someone specially appointed by the court.

On December 17, 2020, the United States filed a verified complaint for civil forfeiture in the United States District Court for the Eastern District of Texas against the following:

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- b. \$234,775.25 seized from Zameer Lokhandwalla on June 18, 2020,
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19, 2020,
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Grams,

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1. One Ruby and Diamond Ring in 18K White Gold,
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Gold,

3. One Cartier Diamond Bracelet in 18K Yellow Gold,
4. One Diamond Solitaire Earring 14K White Gold,
5. One Diamond Bracelet in 14K White Gold, and
6. One Rolex Perpetual Datejust

(collectively, defendant property)

alleging that the property is subject to seizure and forfeiture to the United States for the reasons alleged in the complaint.

The defendant property is currently in the possession, custody, or control of the United States.

In these circumstances, Supplemental Rule G(3)(b)(i) directs the Clerk of the Court to issue an arrest warrant in rem for the defendant property.

Supplemental Rule G(3)(c)(i) provides that the warrant of arrest in rem must be delivered to a person or organization authorized to execute it who may be a marshal or any other United States officer or employee, someone under contract with the United States, or someone specially appointed by the court for that purpose.

YOU ARE COMMANDED to do the following:

1. To arrest the defendant property as soon as practicable by serving a copy of this warrant on the custodian in whose possession, custody or control the property is presently found, and to use whatever means may be appropriate to protect and maintain it in your custody until further order of this Court.



2. Promptly after execution of this process, to file the same in this Court with your return thereon, identifying the individual(s) upon whom copies were served and the manner employed.

Dated:

DAVID O'TOOLE  
Clerk of the Court  
United States District Court for the  
Eastern District of Texas

By: \_\_\_\_\_  
Deputy Clerk

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

**I. (a) PLAINTIFFS**

United States of America

(b) County of Residence of First Listed Plaintiff \_\_\_\_\_  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorney's (Firm Name, Address, and Telephone Number)

Kevin McClendon, USAO, 101 E. Park Blvd., Suite 500  
Plano, Texas 75074 (972) 509-1201

**DEFENDANTS**

\$902,746.64 in U.S. currency, et al

County of Residence of First Listed Defendant Collin  
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE  
LAND INVOLVED.

Attorneys (If Known)

**II. BASIS OF JURISDICTION**

(Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff  
☐ 2 U.S. Government Defendant  
☐ 3 Federal Question (U.S. Government Not a Party)  
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

**III. CITIZENSHIP OF PRINCIPAL PARTIES** (Place an "X" in One Box for Plaintiff and One Box for Defendant)

	PTF	DEF		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated <i>or</i> Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated <i>and</i> Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

**IV. NATURE OF SUIT**

(Place an "X" in One Box Only)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <b>PERSONAL INJURY</b> <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input checked="" type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<b>PRISONER PETITIONS</b> <input type="checkbox"/> 510 Motions to Vacate Sentence <b>Habeas Corpus:</b> <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition		

**V. ORIGIN**

(Place an "X" in One Box Only)

- ☒ 1 Original Proceeding  
☐ 2 Removed from State Court  
☐ 3 Remanded from Appellate Court  
☐ 4 Reinstated or Reopened  
☐ 5 Transferred from another district (specify) \_\_\_\_\_  
☐ 6 Multidistrict Litigation  
☐ 7 Appeal to District Judge from Magistrate Judgment

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

This is an in rem civil forfeiture proceeding pursuant to 21 USC 881

Brief description of cause:

**VII. REQUESTED IN COMPLAINT:**☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No**VIII. RELATED CASE(S) IF ANY**

(See instructions):

JUDGE \_\_\_\_\_

DOCKET NUMBER \_\_\_\_\_

DATE 12/17/2020 SIGNATURE OF ATTORNEY OF RECORD

/s/ Kevin McClendon

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_